



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 2, 2022

BY ECF & EMAIL

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
torres_nysdchambers@nysd.uscourts.gov

Re: *United States v. Brian Kolfage and Andrew Badolato*, 20 Cr. 412 (AT)

Dear Judge Torres:

The Government respectfully submits this letter to request, with the consent of defendants Brian Kolfage and Andrew Badolato, that the Court enter the attached proposed protective order relating to certain grand jury materials produced by the New York County District Attorney's Office ("DANY"), which were the subject of three prior Government submissions (Dkt. Nos. 304, 305, 310) and two prior sealed protective orders relating to the production of those materials to counsel for defendant Timothy Shea. The proposed order submitted herewith will facilitate the production of those same materials to counsel for Kolfage and Badolato.¹

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
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¹ The Government is redacting certain information in the accompanying proposed protective order pursuant to Rule 21.4 of the Court's Electronic Case Filing Rules and Instructions and in light of the need to preserve grand jury secrecy, and will provide an unredacted copy to the Court and the defendant by email, which the Government respectfully requests be filed under seal.

Cc: César de Castro, Esq.
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